

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

JASON WILLIAMS,

Plaintiff,

vs.

AT&T MOBILITY, LLC,

Defendant.

Case No. 5:19-cv-00475-BO

**MOTION FOR EXTENSION OF TIME
FOR DEFENDANT TO RESPOND
TO COMPLAINT
(CONSENT MOTION)**

Defendant AT&T Mobility, LLC (“Defendant”), pursuant to Federal Rule of Civil Procedure 6(b) and Local Civil Rule 6.1, hereby moves this Court to extend its deadline to respond to Plaintiff’s Complaint [Dkt. 2] by thirty (30) days, or until December 20, 2019. In support of this motion, Defendant states the following:

1. Plaintiff filed his Complaint on October 24, 2019, and Defendant received the summons and Complaint on or about October 30, 2019.
2. Defendant’s time to respond to the Complaint has not yet expired. The current deadline for Defendant to respond is until November 20, 2019.
3. Notwithstanding due diligence and good faith efforts, Defendant reasonably requires a thirty-day extension of time, or through and until December 20, 2019 to review and draft an appropriate response to the Complaint.
4. The undersigned counsel conferred with counsel for Plaintiff, who consented to the extension requested herein.
5. A proposed order is submitted with this motion

WHEREFORE, Defendant respectfully prays that this Court grant its motion and order that the deadline by which Defendant must file its response to the Complaint be extended to December 20, 2019.

Respectfully submitted this the 7th day of November, 2019.

KILPATRICK TOWNSEND & STOCKTON LLP

/s/ Jos. Dowdy.

Joseph S. Dowdy (N.C. State Bar No. 31941)

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CERTIFICATE OF SERVICE

I hereby certify that on date set out below, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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This the 7th day of November, 2019.

/s/ Jos. Dowdy.

Joseph S. Dowdy